



# FLORIDA DEPARTMENT OF Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256-7590  
DEP\_NED@dep.state.fl.us

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Noah Valenstein**  
Secretary

## REQUEST FOR ADDITIONAL INFORMATION

August 27, 2019

Gulf Power Company, AKA NextEra Energy  
Michael Spoor, Vice President, Power Delivery  
One Energy Place  
Pensacola, Florida 32520  
[Mike.G.Spoor@nexteraenergy.com](mailto:Mike.G.Spoor@nexteraenergy.com)

Re: First Request for Additional Information (RAI)  
Columbia, Suwannee, Madison, Jefferson, Leon, Gadsden, and Jackson Counties –  
Environmental Resource Permitting Program  
Site Name: North Florida Resiliency Connection Project  
Site ID: 378587  
DEP Application No.: 12-0378587-001-EI

Dear Mr. Spoor:

Thank you for your application for an Individual Permit for a 176-mile, 161-kilovolt (kV) overhead aerial transmission line submitted on July 29, 2019, for the above referenced Site. A review of your application and supporting documentation indicates the application is incomplete. Please provide the information in the attached document and refer to this RAI in your response.

To continue the processing of your application, the Department must receive a response within 90 days of this letter, November 25, 2019, unless a written request for additional time to provide the requested information is submitted and approved. It is the Department's desire to provide prompt turnaround times on permit applications, and a quicker response to this RAI shortens the timeframe for which a final decision on the application can be made. Pursuant to Chapters 62-330 and 62B-49.005, F.A.C., failure of an applicant to provide timely requested information by the applicant deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Your processor will be Kim Pearce and she can be contacted at [Kimberly.Pearce@FloridaDEP.gov](mailto:Kimberly.Pearce@FloridaDEP.gov), or at 904-256-1686. Please submit your response by email to [DEP\\_NED@dep.state.fl.us](mailto:DEP_NED@dep.state.fl.us), with a copy to [Kimberly.Pearce@FloridaDEP.gov](mailto:Kimberly.Pearce@FloridaDEP.gov). If the submittal is very large, you may post it to a folder on this office's ftp site at: <ftp://ftp.dep.state.fl.us/pub/incoming/>. After posting the submittal, send an e-mail to

Gulf Power Company, AKA NextEra Energy

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[DEP\\_NED@dep.state.fl.us](mailto:DEP_NED@dep.state.fl.us), with a copy to [Kimberly.Pearce@FloridaDEP.gov](mailto:Kimberly.Pearce@FloridaDEP.gov), alerting us that it has been posted.

Sincerely,



Thomas G. Kallemeyn  
Permitting Program Administrator

TGK:tm:kp:js

v. 1.8

cc:

Michael Leahy, Pickett and Associates, Inc., [mleahy@PickettUSA.com](mailto:mleahy@PickettUSA.com)

Jude Dawson, ECT, [jdawson@ectinc.com](mailto:jdawson@ectinc.com)

Loretta Cranmer, FPL, [Loretta.Cranmer@fpl.com](mailto:Loretta.Cranmer@fpl.com)

Tom Kallemeyn, FDEP-NED

Kim Allen, FDEP-NWD

Tanya McHale, FDEP-NED

Junhong Shi, P.E., FDEP-NED

Kim Pearce, FDEP-NED

Russell Simpson, FDEP-NED

Brandy Smith, FDEP-NWD

Tim Rach, FDEP-WRM

Attached: List of Requested Information

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Gulf Power Company, AKA NextEra Energy  
Name: North Florida Resiliency Connection Project  
ID: 378587  
DEP Application No.: 12-0378587-001-EI

**Your application does not qualify for an SPGP.** Please see the U.S. Army Corps of Engineers Jacksonville District Regulatory Division Sourcebook for more information about federal permitting. Please call your local Corps office if you have questions about federal permitting.

Regulatory Review

1. The UMAM summary tables (Table 10) appear to have been rounded inappropriately when listing impacts. Additionally, the UMAM summary does not appear to address secondary impacts to wetlands adjacent to the impact areas. Please revise the impact tables, UMAM calculations, and project drawings to include secondary impacts to adjacent wetlands and proper rounding of the numbers. In addition, please submit separate UMAM worksheets for each wetland impact/conversion area – specifically one sheet for the impacts to forested wetlands and another sheet for the conversion to herbaceous wetlands. The Department will conduct site inspections to review and confirm wetland boundaries and UMAM scoring. The wetlands located within the project boundary must be flagged for the Department to verify the delineation. Revisions to the calculations and/or mitigation proposal may be required, pending completion of the field work. After final concurrence and approval of the wetland delineation and UMAM scoring, please provide a Letter of Reservation from the geographically appropriate mitigation banks for the appropriate amount and type of Mitigation Bank Credits. [Section 10.3, AH, Vol.I]
2. Page A-5 of the application states, “GPC has obtained or is currently negotiating agreements with landowners for temporary and permanent easements for both construction and maintenance access.” Please provide documentation of Real Property Interest in all project areas. If RPI for project construction is not yet acquired, the Department will require permission from property owners prior to starting the field work. [Section 4.2.3(d), AH, Vol.I]
3. The application indicates crossing of several waterbodies and wetlands including some that are Outstanding Florida Waterbodies. Attachment C.7 describes a typical temporary bridge detail, however, the location and use of these bridges are not indicated. Please provide construction details and potential impacts of all wetland and waterbody crossings, including those that are temporary in nature. These details and impacts should include, but are not limited to: navigation, public health/safety, and water quality impacts. [Section 10.2, AH, Vol.I]
  - a.) It is notice that the project seems to cross surface waters or wetlands without bridge or fill or other ways between Transmission Poles No. 9-10, 14-16, 26-27, 580-601, 744-745, 1118, 1129, 1142, 1809-1810, 1811-1813, 1815-1816, 1818-1819, 1823-1824, 1827-1831, 1888-1889, 1708-1709, 1788-1800, 1803-1804, 1838-1839, and 1864. Please verify and make sure that design covers all project areas. Refer to Part II of Section E of ERP Application and Rule 62-330.301(1), F.A.C.

4. Staging area 5 appears to be adjacent to a wetland. Please update the drawings to provide a distance from the wetland to the temporary staging area. [Section 10.2.1, AH Vol.I]
5. The staging areas all have a circled H. What does this represent? What materials will be used to construct it? [Rule 62-330.020(2), FAC]
6. The transmission line route traverses sensitive karst terrain in the areas around the Suwannee River and the Santa Fe River. Please provide information on how this construction and operation of this project is protective of these sensitive areas. [Section 5.9, SRWMD AH, Vol.II]
7. Thank you for the Public Interest Test language provided. It appears this project can be deemed “not contrary to the public interest.” However, it is unclear on how this project can be deemed “clearly in the public interest.” Please provide a statement on how this project can be deemed “clearly in the public interest.” [Section 10.2.3, AH, Vol.I]

#### Stormwater Review

8. The application describes eight temporary work areas to be used during construction for staging of materials and contractor trailers. The staging areas show a crushed limestone perimeter road and an interior made of crushed rock over geotextile fabric. These materials are considered semi-impervious or impervious. Additionally, the application describes the construction of a fiber-optic repeater station in Jefferson County. Stormwater treatment and attenuation may be required if project includes new impervious and semi-impervious surfaces of more than 4,000 sq ft subject to vehicular traffic or more than 9,000 sq ft new impervious and semi-impervious surfaces. It appears the permitting thresholds requiring stormwater treatment will be exceeded. Typical Staging Area shows a Cross Section A-A, which is a design for perimeter roads around the staging area. Please extend the cross section to show entire staging area. Additional information and project modifications related to surface water runoff and treatment may be required, pending review of additional project details. [Rule 62-330.020(2), FAC]
9. Please provide a typical cross section for all situations of fill (upland, wetland or surface water, for any purpose, at any onsite or offsite location, with matting or other materials). If one cross section cannot fit all situations, please provide one for each situation. Please note that culvert design shall be provided and supported by calculation if fill will be above grade. Since mats can be as high as 24 inches, they may not be used in all situations. Please address and specify in the design drawings how to avoid blockage of flow when a mat is used. In no time the project shall cause any flooding condition. Refer to Part II of Section E of ERP Application and Rule 62-330.301(1), F.A.C.

#### Proprietary Review

10. Any crossings on State Owned Uplands will require authorization/permission from the State of Florida for proposed work on State Owned Uplands. Any crossings on Water Management District Property will require authorization/permission from the appropriate Water Management District. In addition, any crossings in areas currently under easement by FDOT will require authorization/permission from FDOT. [Rules 18-21.004(3)b. and 18-2.018, F.A.C.]

11. Sufficient Upland Interest in the riparian parcels adjacent to the Sovereign Submerged Land Easements is required to be submitted to the Department prior to execution of the Easement. [18-21.009(1)(c), FAC]
12. Thank you for submitting the easement sketches for the Sovereignty Submerged Lands crossings. These easements are currently under review to ensure they meet Department requirements. Additional requests for corrections may be asked once the reviews of the easement sketches are finalized. [Rule 18-21.009(1)(e), F.A.C.]
13. Thank you for submitting the Proprietary Noticing recipients as required by subsection 18-21.005(3), F.A.C. It appears the Department is missing the noticing labels for the Jefferson County crossings. Please provide. The Department will request additional noticing information once the easement sketches are approved by the Department.
14. Please submit the easement processing fee of \$669.00. [18-21.009(1)(g), FAC]

**NOT A COMPLETENESS ITEM:** Dewatering may require authorization from the Department's Wastewater Section. Please contact Robert Martin, P.G. at [Robert.L.Martin@floridadep.gov](mailto:Robert.L.Martin@floridadep.gov) or at 904-256-1613.